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20 *Attorneys for Defendants C. R. Bard, Inc. and*
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22 UNITED STATES DISTRICT COURT

23 DISTRICT OF ARIZONA

24 IN RE: Bard IVC Filters Products
Liability Litigation,

No. 2:15-MD-02641-DGC

25 **THE PARTIES' JOINT REPORT
IDENTIFYING CASES RIPE FOR
REINSTATEMENT, AND ALL
CASES RIPE FOR REMAND OR
TRANSFER**

1 In Case Management Order No. 48, dated December 9, 2020, (Doc. 21740), the
2 Court directed the parties to submit three different charts: (1) a chart identifying previously
3 dismissed cases ripe for reinstatement, because the plaintiff has “opted out” of a settlement
4 (the “reinstatement chart”); (2) a chart listing “Track 2” cases ripe for remand to appropriate
5 jurisdictions by the Judicial Panel on Multidistrict Litigation, because the plaintiff has not
6 signed a release (the “remand chart”); and (3) a chart of those Track 2 cases ripe for transfer
7 to appropriate jurisdictions because the plaintiff has not signed a release (the “transfer
8 chart”).

9 In accordance with the Court’s instructions, the parties are submitting the attached
10 charts:

11 **Exhibit “A”:** The Reinstatement Chart

12 **Exhibit “B”:** The Remand Chart

13 **Exhibit “C”:** The Transfer Chart

14 The parties note that these charts have been generated by the defendants’ counsel,
15 utilizing data maintained by the defendants to track the status of all MDL cases. The
16 plaintiffs’ Lead Counsel do not maintain data concerning the status of other attorneys’
17 cases, and as a result, cannot independently verify the accuracy of these charts.

18 Finally, Case Management Order No. 48 also extended the dismissal deadline for
19 the roughly 950 Track 2 cases that at that time were subject to a settlement agreement and
20 in which the plaintiff had submitted a signed release. The parties note that additional
21 plaintiffs have signed releases since the date of that order, and the total number of Track 2
22 cases with signed releases is now 1156.

23 The parties stand ready to address any questions or concerns the Court may have.

Respectfully submitted, this 30th day of December, 2020.

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